

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

2021/08/09 PM 12:35
2021/08/09 PM 12:35

DAT RILIO R. M. AMOST

Write the full name of each plaintiff.

____ CV ____

(Include case number if one has been assigned)

-against-

COMPLAINT

Do you want a jury trial?

☒ Yes ☐ No

NYSGOV. ANDREW CUOMO

NYSG Attorney Gen. Letitia

J. AMORE

NYSG Education Commissioner MARY BLA

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ Federal Question

☐ Diversity of Citizenship

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

*I am a victim of racial discrimination
due to my being Filipino
American*

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, _____, is a citizen of the State of _____
(Plaintiff's name)

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of _____

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, NYS Gov. ANDREW CUOMO^{MO}, is a citizen of the State of
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of _____.

If the defendant is a corporation:

The defendant, NYS Government, is incorporated under the laws of
the State of NYS

and has its principal place of business in the State of _____

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____.

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

<u>PATRICIO</u>	<u>12.</u>	<u>MAMOT</u>
First Name	Middle Initial	Last Name
<u>201 50th Ave #3C</u>		
Street Address		
<u>Long Island City</u>	<u>NY</u>	<u>11101</u>
County, City	State	Zip Code
<u>718-729-3290</u>	<u>None</u>	
Telephone Number	Email Address (if available)	

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

ANDREW COUNO
First Name Last Name

NYS GOVERNOR
Current Job Title (or other identifying information)

110 ST. The Capital, ALBANY
Current Work Address (or other address where defendant may be served)

County, City State Zip Code

Defendant 2:

LETITIA JAMES
First Name Last Name

NYS Attorney General
Current Job Title (or other identifying information)

The Capital - ALBANY NYS 12274
Current Work Address (or other address where defendant may be served)

County, City State Zip Code

Defendant 3:

MARY ZELLA
First Name Last Name

NYS COMMISSIONER Dept of Education
Current Job Title (or other identifying information)

55 59 89 WASHINGTON NW
Current Work Address (or other address where defendant may be served)

ALBANY NY 12230
County, City State Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence:

NY City

Date(s) of occurrence:

1998 due to long-standing
lie due to my being

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

Firm Links

Please see my complaint

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

I lost my \$ 225,000 yearly
income due to being ignored,
since 1996

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

I let the court decide
But know I lost my
\$ 225,000 income since 1996
to Greenpathologist with
NHL - Band of Education

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

8/9/21
 Dated
 PATRICIO R.
 First Name Middle Initial
 Plaintiff's Signature
 MAMOT
 Last Name
 2-01 50th Ave #3c
 Street Address
 Long Island City
 County, City
 NY
 State
 11101
 Zip Code
 718-729-3290
 Telephone Number
 NONE
 Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☐ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

FEDERAL DISTRICT COURT OF SOUTHERN NEW YORK
LOWER MANHATTAN, NY NY

GOVERNOR ANDREW CUOMO	X	
NEW YORK ATTORNEY GENERAL		
LETITIA JAMES		
DR. MARY ELA		
COMMISSIONER, NYS DEPARTMENT OF		
EDUCATION		
Respondents		
Vs.		JURY TRIAL REQUESTED
PATRICIO R. MAMOT		
Pro Se Plaintiff		
(Will seek a lawyer ASAP)		
_____	X	

GOV. CUOMO AND ATTY GEN. JAMES: **SHOW ME THE SCORE!**

NYS EDUCATION COMMISSIONER ELA: **TSHH IS DEMEANING AND INSULTING!**

U.S. SEN. KIRSTEN GILLIBRAND AND U.S. INTERNAL REVENUE SERVICES (IRS) COMMISSIONER.: IMAGINE AN IMMIGRANT WHO CAME TO THE U.S. TO HAVE A SLICE OF THE AMERICAN DREAM ENDED UP LIVING AS A WARD OF STATE. I WAS A FORMER WORLD HEALTH ORGANIZATION (WHO) STAFF, WHO WAS CERTIFIED BY NEW YORK CITY BOARD OF EDUCATION IN FRENCH, SPANISH, ENGLISH TAGALOG (FILIPINO) AND, CEUIANO, AND WITH A PH.D. TO BOOT HELPING NYC CHILDREN WITH DELAYED SPEECH AND LEARNING DISABILITIES MOSTLY LIVING IN UNDERSERVE BOROUGHS, LIVING ON WELFARE SIMPLY BECAUSE OF NEW YORK STATE-SANCTIONED SYSTEMIC RACISM FOR THAN 30 YEARS. YOU MAY WISH TO KNOW ALSO THAT I CAME TO US AS A SCHOLAR OF DR. MARTIN PALMER, FORMER WHO CONSULTANT. IF YOU BOTH DID NOT LISTEN TO MY LAMENT AND ANGUISH I WOULD STILL BE LIVING IN UTTER PENURY AND ABJECT POVERTY EXISTENCE. IN AMERICA, THE LAND OF BOUNDLESS OPPORTUNITIES. YOU BOTH AS MY MANNAS FROM HEAVENS. BLESS YOU BOTH !

At the very outset, let me state that there are two sides in the mountain of racial injustice. The sunny side of the mountain are individuals who truly are possessed of humanity and a strong sense of justice. Kudos to

1. U.S. Senator Kirsten Gillibrand, and
2. The U.S Internal Revenue Services (IRS).

I presented to them the same story lines of utter, sickening state-sanctioned misconduct for more than 30 years treating me with deafening silence, as if I don't count and exist. . Thank God both listened and believed in the following story line, portrait of a wanton racial discrimination.

Why? IRS through the intervention of Sen. Gillibrand did not only wipe out my entire tax obligations in tens of thousands of dollars but restore my full pension, lifted the levy on my bank account .for 30 years. As if they were not worthy of celebration and joy, IRS sent me several thousand dollars afterwards.

Again let me reiterate that In this world there are two sides of the mountain, one deserving of laudatory mention One bright side is Sen. Gillibrand and IRS. The dark side is New York State totally disgusting behaviors.

Well, let us proceed with my complaint, to wit:

- 1, I came to New York City in early January 1988 to work with the New York City Board of Education as a contractual speech pathologist.
2. I used under the reciprocity arrangement between Indiana State and New York State, the Indiana State professional License as speech pathologist issued by Indiana State Board of Examiners on Speech Pathology, which was created by law by the Indiana State Assembly.
3. New York City Board of Education certified me in French, Spanish and of course English, Tagalog (Filipino) and Cebuano.

4. I was assigned to provide speech and language therapy and evaluation of children with special needs, i.e., delayed speech

language development, learning disabilities, Down Syndrome, Cerebral Palsy and autism, Asperger Syndrome. I would like to mention here that I wrote a book: SOURCEBOOK ON AUTISM, 400+ Pp. Warren Buffett's observation: "Comprehensive." (Please see further addendum at the end of this complaint regarding how I helped in a unique manner the families of the special-need children.)

5. I was assigned in underserved boroughs, i.e., Harlem, South Bronx, Washington Height. Brownsville., Bedford- Stuyvesant, among other underserved minority communities

6. I worked as speech pathologist from 1988 to 1996. Then New York State Education Department, Albany, issued me "permanent" Certificate for Teacher of Speech and Hearing Handicapped (TSSH). Why, I don't know. I consider it as blatant and egregious abuse of power. TSSH is given to B.S. graduates majoring in teacher of speech and hearing handicapped. I never studied it. I have an M.A. degree in Speech Pathology from Wichita State University, Wichita, Kansas and 51 graduate hours toward a Ph.D. degree in speech pathology from Indiana University, Bloomington, Indiana. Obviously the New York City Board of Education just ignored such puzzling licensing through TSSH certificate. As long as I am able to work as a contractual speech pathologist, it did not bother me either.

7. But 3 years later, i.e., in 1996, the final coup de grace of insult came. NYS Department of Education in cahoots with NYS Supreme Court, Albany, took away my privileges as Speech Pathologist NYS Supreme Court Judge John Conner's ruling claimed that I "took" the New York State examination in speech pathology and "failed." (Now

let us laser focus on the clear wording of "New York State examination." There was none then.) The real ugly head of total, flatout racism bubbled up.

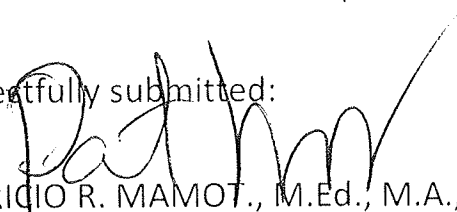
8. OK, let's say for the sake of argument that I really "took" and "failed" such nonexistent NYS examination, am I not entitled – out of sense of truth and fairness and racial justice (I am a Filipino American) to know the answers to the following:

- * When did I take the "NYS examination"
- * Where did I take the examination
- * What was my "failing" score.

9. Your Honorable U.S.District Court – for more than 30 years - I endured years of tortured lament virtually eating my heart and soul, , along with numbing and bruising sense of betrayal by the NYS Department of Education and NYS Supreme Court, both IGNORED MY PLEA FOR ANSWERS. In a painful refrain New York State has rendered me a requiem of wall of utter SILENCE.

Finally, it is with bended knees that I implore the U.S. District Court to demand ANSWERS. Is it too much of a plea? Please help me!

Respectfully submitted:



PATRICIO R. MAMOT., M.Ed., M.A., Ph.D.

Pro Se Plaintiff (will seek legal help ASAP)

2-01 50th Ave. #3C., Long Island City, NY 11101

Phones: 718-729-3290 or 917-742-4472

July 16, 2021

New York City

Gov. Andrew Cuomo
110 Street, The Capitol, Albany 12207

NYS Attorney General
Lititia James
The Capitol, Albany NYS 12224

Dr. Mary Eller Ella
New York State Education Department
Commissioner
President of the University of the State of
New York
89 Washington Ave., Albany NYS 12234
Attention of Mr. James R. Hinds

Supporting Evidentiary Information

EXHIBIT "1"

STATE OF NEW YORK
SUPREME COURT

ALBANY COUNTY

In the Matter of the Application of
PATRICIO R. MAMOT

Petitioner,

DECISION/ORDER

- against -

THE BOARD OF REGENTS, THE NEW YORK
STATE EDUCATION DEPARTMENT, AND THE
UNIVERSITY OF THE STATE OF NEW YORK,

Index No. 2002-98
R.J.I. No. 01-98-ST8716

Respondents.

APPEARANCES:

Petitioner: David G. Ignacio, Jr., Esq.

Respondent: Kathleen Liston Morrison, Esq.
Assistant Attorney General

Connor, J.

Petitioner moves to reargue a Judgment/Order of this Court dated August 23, 1999 which dismissed his petition on the ground that it was time-barred.

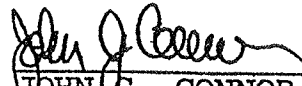
Petitioner who formerly practiced as a Speech Pathologist in the State of Indiana, applied to the Board of Regents for a New York license pursuant to Education Law § 6506 (6). That statute provides that the Board may indorse a license issued by another state providing the applicant has fulfilled certain education and experience requirements.

When petitioner's initial application was not approved, he took the New York licensing examination but did not pass it. Regulations promulgated pursuant to Education Law § 6506 (6) state that a license by endorsement will not be granted where the applicant has attempted unsuccessfully a licensing examination

decision and order shall not constitute entry or filing under CPLR 2220. Counsel is not relieved from the applicable provisions of that section relative to filing, entry and notice of entry.

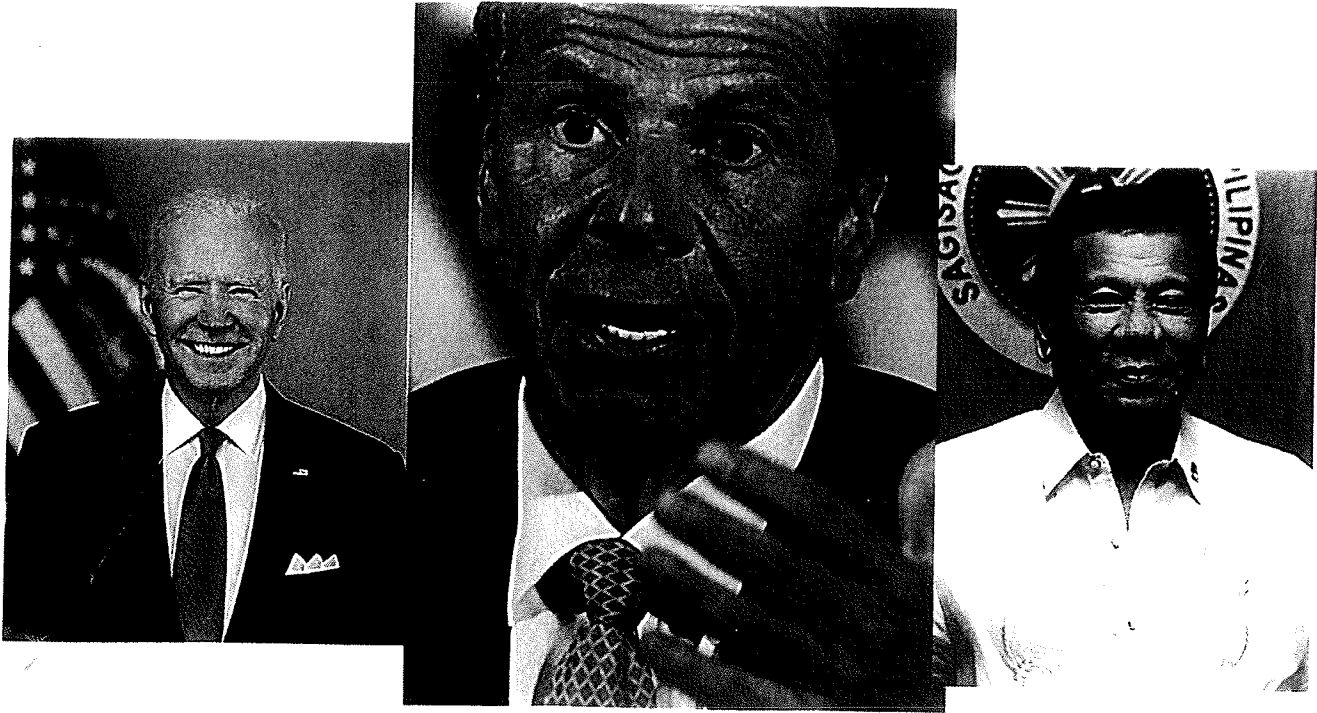
SO ORDERED.

Dated: November *PM*, 1999
Hudson, New York



JOHN G. CONNOR
Justice of the Supreme Court

Papers considered: Notice of Motion dated September 13, 1999;
Affirmation of David G. Ignacio, Jr., dated
September 13, 1999; Affirmation of Kathleen
Liston Morrison dated September 23, 1999 with
supporting exhibit



CASE # 1 ANSWERS,, PLEASE, RE: 1. NYS TSHH CERTIFICATE AND 2. NYS BOGUS EXAM.

GOV. CUOMO AND NEW YORK STATE SUPREME COURT JUDGE CONNOR'S
INTELECTUAL LYNCHING

Why? Because I m a Filipino Asian Amrican?

RESULT OF JUDICIAL MISCONDUCT:

 I LOST \$225,000 YEARLY INCOME

Dear Pres. J. Biden , Pres R. Duterte and Gov. A. Cuomo:

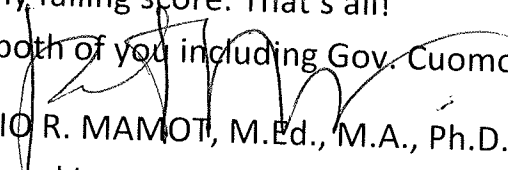
Consider this message as a Hail Mary attempt to seek the American justice. Why did the New York State Department of Education, Albany, issued to me a "CERTIFICATE OF TEACHER OF SPEECH AND HEARING HANDICAPPED." (TSSH). A "PERMANEN," at that!. What an insult!

- The certificate is issued to undergraduate who majors in teaching speech and hearing handicapped. I never studied it. I have an M.A. degree in Speech Pathology from Wichita State University, Wichita , Kansas and 51 pre-doctoral hours in speech pathology from Indiana University, Bloomington, Indiana. Clearly it is an abuse of power. Racism!
- A TSSH candidate must take and pass the NYS-mandated examination. I never took it.

Then nearly 30 years ago (1996), New York State Supreme Court Judge Hon. Connor made a court ruling claiming that I "failed" the New York State examination in Speech Pathology. I asked Hon. Connor to tell me my alleged "failing score." No response FOR 30 YEARS! Too much to bear. It tears my heart and soul! Only deafening silence.

Reason: there was no such NYS Speech Pathology examination. IT WS A HOAX! ✖

✖ Now, Presidents Biden and Duterte as a an American and Filipino (dual citizenship), kindly ask Gov. Cuomo for my score. Perhaps, he will listen to you. Just release my failing score. That's all!
God Bless to both of you including Gov. Cuomo.


PATRICIO R. MAMOT, M.Ed., M.A., Ph.D.

Speech and Language Pathologist (NYC Board of Education certified me in French, Spanish, Tagalog (Filipino) and Cebuano.

Groomed by Manila Mayor Alfredo Lim to be President; of te University of Manila (meant not to be; he lost the mayoralty election)

I came to US in 1965 as W.H.O. consultant Dr. Martin F. Palmer Scholar to pursue a Ph.D. degree.

The University of the State of New York

This certificate, valid for service in the public schools, is granted to the person named below who has satisfied the requirements prescribed by the State Education Department.

The State Education Department Public School Teacher Certificate

PATRICIO R MAHOT
207 PROSPECT PARK SW
APT 6-E
BROOKLYN NY 11218

Certification area: **SPEECH AND HEARING HANDICAPPED**

* Form: **PERMANENT**
Effective date: **09/01/93**

Certificate number **510541387**
Control number: **503850931**

Given under the authority of the State
Education Department

Thomas S. Smith
Commissioner of Education

(OVER)

Important Note:

- I came to New York City in early January 1988 to work with the New York City Board of Education as Speech Pathologist using my Indiana State license.
- NYC Board of Education honored the Indiana license for 8 years under the Reciprocity Clause between New York State and Indiana State. Please refer to Education laws of both states in 1988.
- So it is ludicrous and absurd for me to take and "failed" the York State Exam in Speech Pathology, which did not exist.
- In case one questions my credentials, look at the New York State Education Department record as attached.
- I rest my case.

Patricio R. Mamot
PATRICIO R. MAMOT, M.Ed., M.A., Ph.D.

Indiana Board of Examiners On Speech Pathology & Audiology

KNOW ALL MEN BY THESE PRESENTS:

That Patricio R. Mamot
has complied with the requirements of Indiana Public Law 262
passed by the General Assembly in the year 1973 and has
been duly licensed in accordance with the law and the examin-
ing board and is now entitled to practice in the field of

STATE OF INDIANA
HEALTH PROFESSIONS SERVICE BUREAU
DIVISION 7
ADDRESS
PATRICIO R. MAMOT
SPEECH PATHOLOGIST

Speech Pathology

Patricio R. Mamot

James A. Alban
James A. Alban
Sec. 104

THE NEW YORK STATE EDUCATION DEPARTMENT Committee on the Professions Summary of Application

Committee on the Professions: 05/07/97

Board of Regents: 06/12/97

97-04-58 SPEECH LANGUAGE PATHOLOGY
Patricio R. Mamot
(continued)

APPLICABLE REQUIREMENTS: Section 8206 of Education Law and Part 75 of the Commissioner's Regulations require:	QUALIFICATIONS:
(1) Completion of a registered program in speech-language pathology leading to master's degree or the equivalent, as determined by the Department, including specified course work.	(1) Wichita State University, M. A. in Logopedics, August 1967. (2) Indiana University, 51 semester hours of graduate level study, 1967-1970.
(2) Not less than nine months of satisfactory supervised experience following completion of a program that meets the above requirements.	(2) Forms 3 and 4 submitted showing supervised experience from February 16, 1988 to February 15, 1989.

Gov. Andrew Cuomo
110 Street, The Capitol, Albany 12207

NYS Attorney General
Lititia James
The Capitol, Albany NYS 12224

Dr. Mary Eller Ella
New York State Education Department
Commissioner
President of the University of the State of
New York
89 Washington Ave., Albany NYS 12234
Attention of Mr. James R. Hinds

Note to Dr. Ella, Your Mr. Hinds wrote me a letter dated July 28, 2017.

Kindly take note of the Letterhead in his letter. It clearly states "State Board for Speech Pathology and Audiology." There was no mention of "Board of Examiners." Therefore, one can assume that NYS "Board for Speech Pathology and Audiology" was created by an administrative fiat, not by law. I surmise that you may have participated in crafting such administrative initiative. Unlike the "Indiana Board of Examiners for Speech Pathology." It was enacted by the Indiana State Assembly, under which I was granted a Professional License in Speech Pathology by law – not by administrative policy decision. I started working in January 1988 as Speech Pathologist with the New York City Board of Education under the reciprocity clause in New York State Department of Education. I am very certain that under the NYS Board for Speech and audiology there must be some new specific licensing requirements. THERE WAS NO SUCH NEW YORK STATE BOARD FOR SPEECH PATOLOGY AND AUDIOLOGY WHEN I CAME TO NYC IN 1988. If for some argument that the new NYS BOARD should be

bound to prosecute big-time corporations, which are supposed guilty of crimes, like the Trump Organization, for alleged crimes.

WHAT I CANNOT UNDERSTAND IS THAT YOU HON. JAMES, EVEN WHEN YOU WERE NEW YORK CITY PUBLIC ADVOCATE FAILED TO LOOK INTO THE MISCONDUCTS OF BOTH NYS DEPARTMENT OF EDUCATION AND NYS SUPREME COURT, ALBANY. I AM A NEW YORKER YOU KNOW. I BEGGED AND BEGGED FOR YOUR HELP, BUT YOU APPEARED TO PLAY DEAD NEVER HELPING ME. YOU (INCLUDING THAT OF GOV. CUOMO) TREATED ME WITH SEPULCHRAL SILENCE EVEN TO THIS DAY AS I WRITE THIS NOTE.

WHY? AM I NOT COLORED ENOUGH (BEING FILIPINO AMERICAN)? FOR CHRIST'S SAKE, MOVE THE NEEDLES TOWARD RESOLVING MY CASE. JUST DO IT LIKE WHAT YOU ARE DOING WITH THE TRUMP ORGANIZATION. YOU SEEM OBSESSED AND OBSCENELY FASCINATED RUNNING AFTER THE TRUMP ORGANIZATION, NOT ANY MEMBER OF THE TRUMP FAMILY. YOUR HONOR ATTORNEY GENERAL. NOTHING POLITICAL HERE. JUST HELPING YOUR OFFICE FIND YOUR ADMISTRATIVE AND JUDICIAL MORAL COMPASS. YOUR ATTORNEY GENERAL OFFICE PHONE IS JUST AFINGER AWAY. JUST LIFT THE PHONE AND ASK BOTH NYS DEPARTMENT OF EDUCATIO N AND NYS SUPREME COURT AND DEMAND ANSWERS TO MY 2 QUESTIONS. SMPLE AS THAT. NOTHING PROFOUND HERE. If for some warped reasons you (and Gov. Cuomo) continue ignoring and snubbing, me for more than 30 years, well to heck with you both including of course you Dr. Ella of the NYS Department of Education my plea for answers, then may I ask you all: Are you all without a sense of humanity, of abiding faith in American justice? You both preoccupied with the Trump Organization, I would shamelessly claim that you both are cringeworthy of derision and revulsion. Why would the three of you treat me like a piece of shit? Do you gather the impression that I am angry as hell? You bet. What more than 30 years of being treated like a trash can do. My mind has been running riot with anger!

applied to me retroactively, I say it is patently and glaringly UNCONSTITUTIONAL. In political debates, one says "It is the economy, stupid." Well, in legal arguments, one might say "it is the Constitutional, st....d."

NOTE TO NYS A.G. LETITIA JAMES. Please read my arguments above, you hear!

Oh, before I forget, Dr. Ella you had the gumption of duping Sen. Gillibrand by informing her that I "failed" the NYS exam. for speech pathology WITHOUT TELLING MY "FAILING" score! From one academician to another, may I ask: Can you dig it?

